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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SEARS HOLDINGS CORPORATION, et al.

Chapter 11

Case No: 19-23538 (RDD)

Debtors.

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NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS AND
REQUEST TO BE ADDED TO THE MASTER SERVICE LIST

PLEASE TAKE NOTICE, that the firm of LAZARUS & LAZARUS, P.C., attorneys for Cynergy Trading hereby requests special notice of all events relevant to the above-referenced bankruptcy proceeding, including all pleadings or documents filed in relation to the above-referenced adversary proceeding, the filing of any requests for hearings, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committee and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced Bankruptcy Court.

LAZARUS & LAZARUS, P.C., requests that for all notice purposes and for inclusion in the master mailing list in this case, the following address be used:

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Neither this Request for Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party:

- a. Right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States Bankruptcy Court Judge;
- b. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;
- c. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confession or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: New York, New York
November 18, 2019

Yours,
LAZARUS & LAZARUS, P.C.
Attorneys for Cynergy Trading

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